



SOUTH COAST RAIL ECONOMIC DEVELOPMENT AND LAND USE CORRIDOR PLAN

STATE INVESTMENT IN THE SOUTH COAST REGION AND IMPLEMENTATION OF THE CORRIDOR PLAN: FY 2012

*South Coast Rail Inter-Agency Working Group
February 3, 2014*



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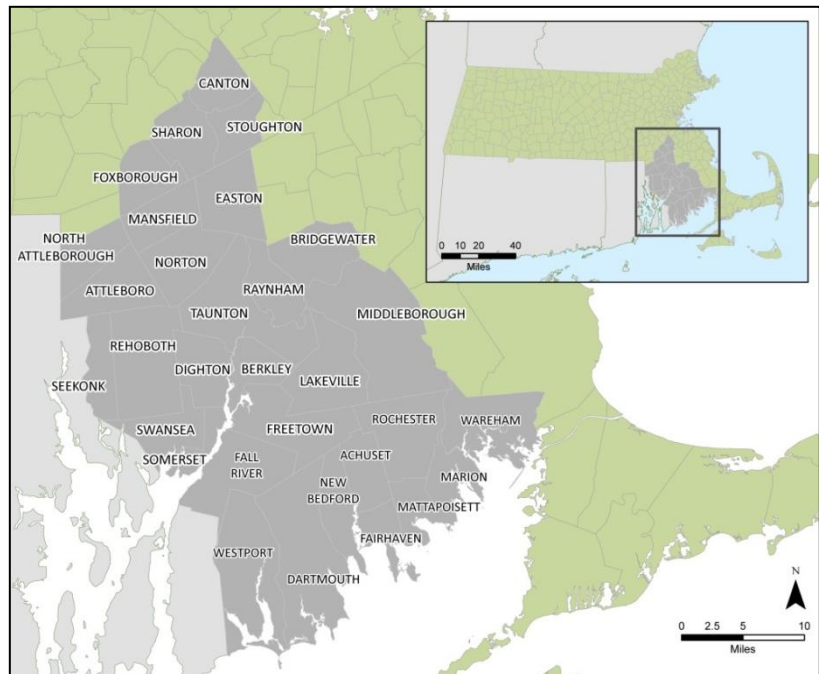
1. Introduction

This report is submitted in compliance with Executive Order 525¹ (“E.O. 525”), issued by Governor Deval Patrick in the fall of 2010, and to provide information on the implementation of the *South Coast Rail Economic Development and Land Use Corridor Plan*² (the “Corridor Plan”). This report is intended to provide a brief history of the South Coast Rail Corridor Planning process and to report on the consistency of Fiscal Year 2012 state investments in the South Coast region with E.O. 525. It also outlines how E.O. 525 is being implemented to ensure that investments by state entities are made in support of the land use objectives outlined in the *Corridor Plan*.

This is the second report to review state investment decisions made within the South Coast region since the issuance of E.O. 525 in 2010. This is, however, the first report to focus on investment decisions made in a complete single fiscal year occurring after the Executive Order. The previous report, published in 2011, reviewed investment decisions made within the South Coast region between Fiscal Year 2009 and Fiscal Year 2011, or July 1, 2008 and June 30, 2011.

The *Corridor Plan* is a growth and preservation framework for Massachusetts’ 750 square mile South Coast area. The region is made up of a total of 31 communities which include older cities, mature suburban towns, and rural communities, as shown in Map 1. The *Corridor Plan* was developed to integrate planning for state transit investments with economic and land use development and the Commonwealth’s Sustainable Development Principles on a regional

Map 1: The South Coast Rail Corridor Geography



¹ Appendix A – Executive Order 525

² Appendix B – South Coast Rail Economic Development and Land Use Corridor Plan – Executive Summary

scale. The *Corridor Plan* identifies areas that are appropriate for new development; including compact higher-density development, particularly around the proposed new transit stations. It also identifies and encourages the protection of environmentally sensitive lands for recreation, conservation and habitat preservation.

The *Corridor Plan* marks Massachusetts' first effort to truly coordinate transportation investment with economic development and land use planning through a highly collaborative process. As a result, the *Corridor Plan* is the nexus between public investment in transit and smart growth within the region. Moreover, the *Corridor Plan* has been nationally recognized by the Congress for the New Urbanism (CNU) as a model for regional planning and action to advance sustainability. In addition, the *Corridor Plan* was awarded the Presidential Award for Outstanding Planning in 2009 by the American Planning Association, Massachusetts Chapter.

2. Background and Context

The *South Coast Rail Economic Development and Land Use Corridor Plan* was released by Governor Deval Patrick in August 2009. The *Corridor Plan* emerged from a partnership among:

Six state agencies	<ul style="list-style-type: none"> - Executive Office of Administration and Finance, - Executive Office of Energy and Environmental Affairs - Executive Office of Housing and Economic Development - Department of Capital Asset Management - Department of Housing and Community Development - Massachusetts Department of Transportation 	
Three regional planning agencies	<ul style="list-style-type: none"> - Southeastern Regional Planning and Economic Development District - Old Colony Planning Council - Metropolitan Area Planning Council 	
Thirty-one corridor communities	<ul style="list-style-type: none"> - Canton - Sharon - Stoughton - Foxborough - Mansfield - Easton - North Attleborough - Attleboro 	<ul style="list-style-type: none"> - Berkley - Fall River - Westport - New Bedford - Dartmouth - Mattapoisett - Marion - Wareham

- Norton	- Rochester
- Bridgewater	- Acushnet
- Raynham	- Lakeville
- Taunton	- Dighton
- Rehoboth	- Middleborough
- Seekonk	- Freetown
- Swansea	- Fairhaven
- Somerset	

In addition to the above partners, a regional task force, local businesses, environmental advocacy groups and the general public participated in over 100 civic engagement meetings that were held as part of this collaborative process.

The Corridor Plan contains the Corridor Map, which identifies state-endorsed Priority Areas. In the Corridor Map, Priority Areas are categorized into two distinct areas: Priority Development Areas (PDA) and Priority Protection Areas (PPA).

What are Priority Development Areas (PDA)?

Priority Development Areas are designated sites appropriate for increased development or redevelopment due to several factors, such as good transportation access, available infrastructure (primarily water and sewer), an absence of environmental constraints and local support. PDAs can range in size from a single parcel to many acres. Potential development ranges from small-scale infill to large mixed-use projects. Town and village centers, Growth Districts, Chapter 40R Districts, and proposed station sites are examples of PDAs. Large-scale land conservation is not expected within the PDAs.

What are Priority Protection Areas (PPA)?

Priority Protection Areas are areas that are important to protect due to the presence of significant natural and cultural resources, including endangered species habitats, areas critical to water supply, scenic vistas and farms. Like PDAs, the protection areas can vary greatly in size. Some sites could be candidates for protection through acquisition or with conservation restrictions, and others are appropriate for limited development that is compatible with the resources present.

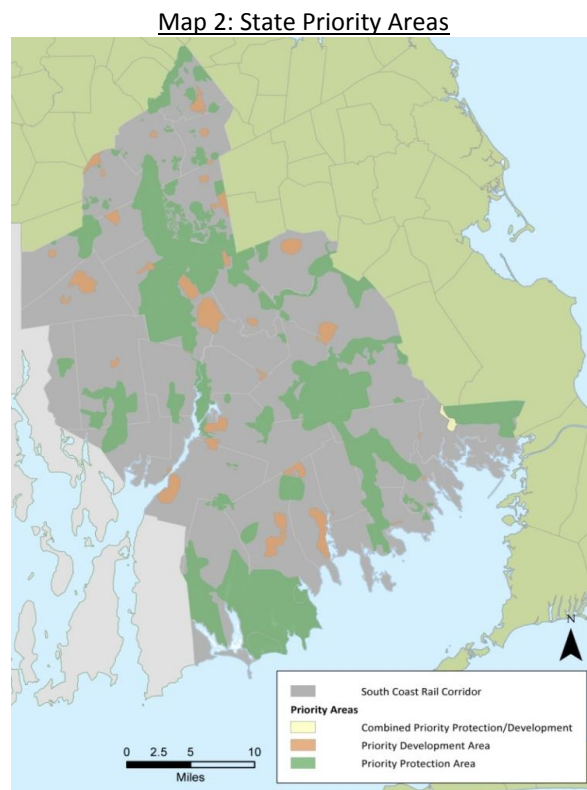
In the *Corridor Plan*, priority areas were conceived as statements of intent. A range of development scales and levels of protection is intended for the individual areas, and state actions should, for the most part, be consistent with these goals. Deviations were anticipated based on acceptable justifications; for example, a development area could include an urban park, and protection areas are likely to see limited, appropriate

development. A description of each area and the type of land use envisioned for the site is included within the *Corridor Plan*.

Priority Development Areas and Priority Protection Areas were identified through an intensive, bottom-up process beginning at the local level. The process of identifying and screening areas of local, regional and state significance began with a list of locally identified PDAs and PPAs. The local areas were then mapped and reviewed by the three Regional Planning Agencies to develop a list of regional Priority Development and Preservation Areas. The State then reviewed the local and regional priorities and further refined the regionally identified priority areas to develop a list of PDAs and PPAs that were consistent with state priorities. In total, the final Corridor Map includes 106 priority areas that were identified as significant in the local, regional, and state process. The priority areas identified in each phase of the process included:

- LOCAL: 198 PDAs, 226 PPAs, and 65 combined PDA/PPAs were identified by the 31 cities and towns in the region.
- REGIONAL: 33 PDAs, 43 PPAs, and 3 combined PDA/PPAs were identified by the regional planning agencies.
- STATE: 33 PDAs, 72 PPAs, and 1 combined PDA/PPA were identified as state priority areas in the South Coast region, as shown in Map 2.

In fall 2010, Governor Patrick issued E.O. 525 providing for the implementation of the *Corridor Plan* and Corridor Map through state agency actions and investments. The Executive Order calls for state investments to be consistent with the *Corridor Plan's* recommendations to the maximum extent feasible. These state actions have the potential to leverage local and private investments in the priority areas. The Executive Order also directs state agencies to conduct a one-time retrospective analysis to determine how consistent their actions and investments in the region have been with the *Corridor Plan* goals.



Based upon the issuance of E.O. 525 in fall 2010, state agencies must now consider plan consistency when making funding decisions. In order to facilitate the consideration of E.O. 525 in the decision making process, all state agencies have outlined their actions to maximize compliance with the *Corridor Plan* in their investment decision making. As an example of the type of actions that have been taken, many state program applications now require that applicants from the 31 cities and towns in the South Coast Corridor outline how their project is consistent with the *Corridor Plan*.

3. Fiscal Year Reporting

Executive Order 525 instructed six state agencies to conduct an annual review of investments that have been made in the South Coast Rail Corridor Region and to assess the consistency of those investments with the *Corridor Plan*.

To complete the Fiscal Year 2012 report state agencies reviewed investment decisions that were made within the South Coast Region between July 1, 2011 and June 30, 2012. In total, 74 state agency investments were reviewed. They were captured in the following 22 state programs:

- MassWorks Grants
- Brownfields Revolving Fund
- Economic Development Fund
- Chapter 40R smart growth districts
- Chapter 40B housing developments
- Rental Round Assistance
- Brownfields Tax Credit
- Construction of new state buildings
- New office leases
- Disposition of surplus property
- EEA agency land acquisitions
- Gateway City Parks
- PARC (Urban Self-Help)
- LAND (Self-Help)
- Agricultural Preservation Restriction Program
- Conservation Partnerships
- Drinking Water Supply Protection Program
- State Revolving Fund- clean and drinking water projects
- Transportation Improvement Program projects
- Non-Federal Aid transportation projects
- Intermodal Transportation Program
- South Coast Rail Technical Assistance Program

The consistency of state investments in the South Coast region was measured using the following three consistency measures:

1. Investments were considered consistent with the *Corridor Plan* if the physical location of the investment was within a state identified Priority Development

- Area and the investment supported and helped to further the development goals within the Area;
2. Investments were considered consistent with the *Corridor Plan* if the physical location of the investment was within a state identified Priority Preservation Area and the investment furthered the preservation goals within the Area; and
 3. Investments were considered consistent with the *Corridor Plan* if the physical location of the investment was outside of a state identified priority area, but the investment supported and furthered the goals of the Area. For example, if a state investment was made to expand storm water infrastructure located outside of a priority area, but the infrastructure was required to support future development on an adjacent parcel of land, which was identified as a Priority Development Area.

Investment Decisions and *Corridor Plan* Compliance

In FY12, \$139.1 million was committed to projects in communities in the South Coast region, though much of the funding committed will actually be spent in future years. This calculation is based on an assessment of state agency investments made through all of the programs outlined in Section 3 and is shown below in Table 1.

Table 1: Total Investment Commitment, FY12, South Coast region		
Agency	Number of Investments	Total Investment
DCAM	22	\$10,340,958
DHCD	8	\$17,839,274
EOEEA	28	\$68,410,700
EOHED	8	\$11,026,020
MassDOT	8	\$31,494,284
TOTAL	74	\$139,111,236

Of the \$139.1 million committed in the South Coast region in FY12, approximately \$12.1 million or just under 9 percent was spent in FY12, as shown in Table 2.

Table 2: Fiscal year spending related to investment decisions made in FY12, South Coast region		
Agency	FY Spending	% of Total Investment Decisions
DCAM	\$4,371,631	42%
DHCD	\$2,909,838	16%
EOEEA	\$2,136,480	3%
EOHED	\$2,653,395	24%
MassDOT	\$0	0%
TOTAL	\$12,071,344	8.7%

Of the \$139.1 million committed in the South Coast region in FY12, approximately \$34 million or 24 percent was directed to Priority Preservation Areas, as shown in Table 3.

Table 3: Total Investment Commitment, Located in Priority Preservation Areas, FY12, South Coast region

Agency	Number of Investments	FY Commitment	% of Total Fiscal Year Funding Commitment
DCAM	3	\$324,415	3%
DHCD	0	\$0	0%
EEA	9	\$30,059,500	44%
EOHED	0	\$0	0%
MassDOT	2	\$3,645,067	12%
	14	\$34,028,982	24%

Of the \$139.1 million committed in the South Coast region in FY12, \$45 million or 32 percent was directed to Priority Development Areas, as shown in Table 4.

Table 4: Total Investment Commitment, Located in Priority Development Areas, FY12, South Coast region

Agency	Number of Investments	FY Commitment	% of Total Fiscal Year Funding Commitment
DCAM	8	\$5,755,633	56%
DHCD	2	\$10,729,426	60%
EEA	4	\$4,466,200	7%
EOHED	5	\$10,946,020	99%
MassDOT	2	\$13,123,565	42%
	21	\$45,020,844	32%

Of the \$139.1 million committed in the South Coast region in FY12, \$131.3 million or 94 percent was determined to be consistent with the *Corridor Plan*, as shown in Table 5. An investment was deemed to be consistent with the *Corridor Plan* if it furthered the development or preservation goals of a priority area. In some cases, the investment was located outside of the priority area; however, it was identified as being consistent if it supported the goals of the *Corridor Plan*.

Table 5: Total Investment Commitment, Consistent with the *Corridor Plan*, FY12, South Coast region

Agency	Number of Investments	FY Commitment	% of Total Fiscal Year Funding Commitment
DCAM	8	\$5,755,633	56%
DHCD	7	\$16,069,441	90%
EEA	28	\$68,410,700	100%
EOHED	5	\$10,946,020	99%
MassDOT	7	\$30,125,544	96%
	55	\$131,307,338	94%

4. State Agency Actions: Providing for Further Implementation of the *Corridor Plan*

Since the signing of E.O. 525, the affected agencies have collectively undertaken a number of actions to ensure compliance, including:

- The development of a strategic plan, by agency, for implementing the Executive Order;
- The collection of data to report the implementation of the Executive Order by agency, which will be summarized in an annual report;
- Seeking approval from other agencies for investments that are inconsistent with the *Corridor Plan* (for example, EEA would need to justify an exception to the E.O. 525 for land conservation in a Priority Development Area); and
- Incorporating a preference for projects or investments that are consistent with the *Corridor Plan* into project selection criteria.

In addition, each effected agency has made the following commitment to support the further implementation of E.O. 525.

Division of Capital Asset Management

The following is a list of actions taken by the Division of Capital Asset Management (DCAM) to support and implement the recommendations of the *South Coast Rail Land Use Corridor Plan*:

- Planning and programming DCAM projects in Priority Development Areas - The Office of Planning, Design and Construction is, in the early planning and programming stages of projects, establishing the feasibility of locating facilities within the Priority Development Areas (PDAs) as established by the *South Coast Rail Land Use Corridor Plan*.
- Sale and purchase of Commonwealth Land in Priority Development Areas - The Office of Real Estate, when engaged in the sale of Commonwealth land, or soliciting parcels to purchase for Commonwealth purposes within PDAs, is referencing E.O. 525 and the *Corridor Plan* development goals.
- *Leasing State Office space* - The Office of Leasing and State Office Planning is incorporating into its RFPs for leased facilities a preference for proposals that advance the objectives of E.O. 525.

Executive Office of Housing and Economic Development

The Executive Office of Housing and Economic Development has integrated the *Corridor Plan* and the principles of E.O. 525 into all aspects of planning and investments where appropriate. Specific actions taken by EOHED include:

- EOHED continues to be involved in the administration of Technical Assistance to South Coast communities to help further the revitalization and redevelopment of those locations identified as Priority Development Areas in the *Corridor Plan*.
- EOHED is directing infrastructure investment through the MassWorks Infrastructure Program to support growth that is consistent with the *Corridor Plan*. EOHED has included consistency with the *Corridor Plan* as a requirement in the MassWorks Infrastructure Program screening process.
- EOHED has revised the District Local Technical Assistance Program to encourage regional planning agencies to direct technical assistance resources to implement planning and zoning changes needed to create prompt and predictable permitting within areas identified as a priority through the *Corridor Plan* or through other regional planning efforts.
- EOHED has replicated the South Coast Rail Corridor planning process by initiating and funding both the 495/MetroWest Development Compact Regional Planning Study and the Merrimack Valley Regional Planning Study.
- EOHED intends to further replicate the South Coast Rail Corridor planning process in other parts of the state and ultimately seeks to create a statewide map that will identify priority areas for development and preservation, which can be used by state agencies to inform the decision making process.
- EOHED continues to provide information and direct links from the EOHED website to regional planning efforts, including the South Coast Rail Corridor planning process, the 495/Metro West Development Compact Regional Planning Study, and the Merrimack Valley Regional Planning Study to promote regional planning efforts to state agencies, stakeholders, and Commonwealth residents.
- EOHED departments have also implemented steps to align their work with the *Corridor Plan* and principles of E.O. 525. EOHED has briefed appropriate staff working within the South Coast Rail Region to make them aware of the *Corridor Plan* and E.O. 525. Additional steps will be taken by EOHED departments including:

The Department of Housing and Community Development (DHCD)

- The Department of Housing and Community Development (DHCD) prominently displays a map of the South Coast Corridor within its Front Office area. Other materials are also displayed and offered to visitors to DHCD's offices.
- DHCD has included questions related to the location and consistency with the *Corridor Plan* in appropriate application documents.

- DHCD provides technical assistance to communities that request assistance through the Office of Sustainable Communities, which provides assistance and training to communities through one-to-one staff assistance, professional and peer consultants, written guidance, workshops, and presentations.

The Executive Office of Energy and Environmental Affairs (EEA)

The following is a list of actions taken by EEA to support and implement E.O. 525 and the recommendations of the *Corridor Plan*:

- Programs that require an application (with the exception of the Agricultural Preservation Restriction Program) include a request that communities indicate whether the proposal is consistent with the *Corridor Plan*, including whether the project is in a Priority Preservation Area (PPA), Priority Development Area (PDA), or on “neutral” ground.
- Land conservation programs give preference to projects in PPAs; the Gateway City Parks Program gives preference to projects in PDAs; and the DWSP, SRF, and PARC Programs seek Plan consistency without preference.
- The SRF Program is a special case. Federal requirements constrain the ability of the Program to respond to policies like E.O. 525. Also, SRF must fund certain types of projects, such as those that protect public health. Within these constraints EEA works with the program manager to determine the best ways to address E.O. 525.
- EEA provides technical assistance cognizant of E.O. 525’s directive to target technical assistance programs, when working with South Coast municipalities, to advance the appropriate development of priority development areas and the permanent protection of lands identified as priority protection areas.

Exceptions:

- Any land conservation program besides PARC or Gateway City Parks desiring to conserve land in a PDA contacts EEA’s Grants Office as soon as this circumstance is realized. The Office works with the program manager, and if circumstances warrant, with ANF and other agencies to justify an exception to the *Corridor Plan*.
Note: EEA has in place a protocol requiring grant recommendations to be routed through EEA’s Grants and Technical Assistance Office for approval. As a safeguard at this stage, all recommendations are reviewed for consistency with E.O. 525, and any concerns addressed. While specific agency land acquisitions do not undergo EEA review (EEA sets program budgets, influences project selection criteria, and receives a report on agency acquisitions at the end of each fiscal year), land acquisition staff has been directed to contact the Grants Office should they wish to pursue an acquisition that is within a PDA.

Resources for Program Managers:

- The *Corridor Plan* has been provided to managers in paper form.
- Electronic maps have been provided in several forms. A PDF version of the map allows those without GIS skills to determine if a project is in a PDA or PPA. In addition, a GIS data layer of the PPAs and PDAs allows agency GIS staff to perform more sophisticated GIS analysis.

Massachusetts Department of Transportation (MassDOT)

The following is a list of actions taken by MassDOT to support and implement the recommendations of the *Corridor Plan*:

- MassDOT Divisions - MassDOT's Divisions, in particular Highway, are considering the *Corridor Plan* as they make investments in maintenance and other actions. These investments include both federally and non-federally funded projects.
- MassDOT Planning - As MassDOT's Office of Transportation Planning (OTP) analyzes other corridors for transportation needs and potential investment, staff consult the SCR Corridor Plan where these other corridors intersect with the commuter rail corridor. In addition, MassDOT chairs the Commonwealth's Metropolitan Planning Organizations (MPO). In this role, MassDOT regularly briefs each of the relevant MPOs-Boston, Old Colony, and Southeast Massachusetts-on the *Corridor Plan*. The intent of these briefings is to educate the MPOs on this corridor so that they can consider this Plan as they program investments.

Appendix

Appendix 1 – Executive Order 525

By His Excellency
DEVAL L. PATRICK
GOVERNOR

EXECUTIVE ORDER NO. 525 IMPLEMENTATION OF THE SOUTH COAST RAIL CORRIDOR PLAN

WHEREAS, the South Coast region is experiencing significant economic challenges including limited access to the labor, education, and health care markets of the Greater Boston economy.

WHEREAS, the Commonwealth of Massachusetts has committed to restoring public transit between Boston and the South Coast cities of Fall River, New Bedford, and Taunton and the surrounding 28 communities.

WHEREAS, the South Coast Rail project will improve regional mobility creating the potential for new jobs and economic development across the region.

WHEREAS, this potential can be realized and maximized by promoting and supporting sustainable land use and development across the region.

WHEREAS, the Commonwealth of Massachusetts released the South Coast Rail Economic Development and Land Use Corridor Plan (the “Corridor Plan”) in 2009 that, through an unprecedented civic engagement process, identifies priority areas for additional growth and for land preservation thereby creating a long term vision for the sustainable development of this region.

WHEREAS, the Corridor Plan’s smart growth framework calls for the clustering of jobs and homes around new stations, in downtowns and village centers, and for the permanent protection of the South Coast’s environmentally sensitive forests, wetlands, farms, and habitat areas.

WHEREAS, the implementation of the Corridor Plan will require coordinated and sustained efforts on the part of the Commonwealth, the South Coast communities, businesses, property owners and residents over many years.

WHEREAS, the Commonwealth of Massachusetts has committed, on its part, that its agencies will act in a manner consistent with the Corridor Plan and provide incentives and support to others to do so as well.

NOW, THEREFORE, I, Deval L. Patrick, Governor of the Commonwealth of Massachusetts, by virtue of the authority vested in me by the Constitution, Part 2, c.2, § I, Art. I, order as follows:

I direct state agencies to review their policies, actions and investments to support and implement the recommendations of the Corridor Plan. Investments in infrastructure and land preservation, whether directly made by state agencies such as constructing new buildings or office leases or through grants and loans to municipalities, will be consistent with the Corridor Map to the maximum extent feasible. Investments include, but are not limited to, water, wastewater, transportation, housing and economic development funding and land preservation funding.

Furthermore, I direct the Executive Office of Administration and Finance (A& F) to develop a two-year retrospective analysis of all significant investments to ascertain consistency with the Plan. In addition, a web-based tracking system will be developed to track investment decisions and ensure that policy decisions are transparent.

Agencies are further directed to target technical assistance programs working with South Coast municipalities to advance the appropriate development of priority development areas and the permanent protection of lands identified as priority protection areas. Training, workshops, planning and support for developing zoning changes that will advance the Plan are examples of the types of technical assistance that will be provided.

Each Agency affected by this Order shall, within one year following the date of this Order and thereafter on an annual basis, report of the status and effectiveness of its compliance with this Order to the Development Cabinet.

This Executive Order shall continue in effect until amended, superseded or revoked by subsequent Executive Order.

Given at the Executive Chamber in Boston this 29th day of September in the year two thousand and ten, and of the Independence of the United States of America two hundred and thirty-four.

DEVAL L. PATRICK
GOVERNOR
Commonwealth of Massachusetts

WILLIAM FRANCIS GALVIN
Secretary of the Commonwealth

GOD SAVE THE COMMONWEALTH OF MASSACHUSETTS

Appendix 2 – South Coast Rail Economic Development and Land Use Corridor Plan (Executive Summary)

Available at: <http://southcoastrail.com/downloads/1%20-%20Corridor%20Plan%20Executive%20Summary.pdf>

Appendix 3 – Priority Development Areas and Priority Preservation Areas - Detail

More on PDAs

The PDAs range from massive industrial parks and urban centers to village areas appropriate for small-scale infill development. Some sites are primarily suitable for industrial or large scale mixed-use development and others are more capable of absorbing smaller, residential developments. Many sites are already served with water and sewer, but some would require sewers or package treatment systems in order to support higher densities. And there are some sites in the middle – development-ready with smaller infrastructure needs such as an improved roadway or sewer line extension. Recreation, park, and open space projects are likely to be consistent with the Corridor Plan if they improve the livability, equity, and environment of these areas. However, open space preservation with limited benefits, such as protecting lands with only marginal natural resource value, should not be used to stop or preclude good development projects from taking place. And of course, ecologically-sensitive design and energy efficient projects are always appropriate in PDAs.

More on PPAs

Some of the PPAs cover hundreds of acres such as the Areas of Critical Environmental Concern (ACECs) and the Farm Protection Area found in much of southern Westport and Dartmouth. It is unreasonable to expect such vast areas will experience no new development. However, land protection efforts are appropriate to preserve the working landscapes and parcels with outstanding natural or cultural resources. For development that does occur in these areas, it is important that it is at a scale and utilizes a design that protects the existing resources. Techniques that can help ensure ecologically sensitive design include Low Impact Development (LID) and Natural Resource Protection Zoning (NRPZ), which protects a large portion of the site as open space while clustering the homes on smaller lots. Development that does occur within PPAs should not be abetted by state actions or investments.

River and Open Space Corridors

Rivers and Open Space Corridors were identified as Priority Protection Areas as well, including corridors in the MAPC towns of Foxborough, Sharon, Canton, and Stoughton.

The *Corridor Plan* states: “These corridors have no proposed set width or buffer. They are intended to convey the idea that lands along the rivers and providing connections between key open spaces are important protection priorities. In the case of rivers, the corridors are also intended to convey the idea that some larger parcels extending further away from the riverbank are suitable for protection as well.” On the other hand, there may be opportunities for the redevelopment of existing mills and other structures that are located close to rivers that can result in appropriate development.

Opportunities may exist to reduce impervious surface, increase storm water infiltration and capture, and actually improve the health of the nearby water bodies. For the open space corridors, continuity is critical to provide linear and unbroken wildlife and recreational connections. Projects that intrude or sever these connections are certainly inconsistent with the *Corridor Plan*.